

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUÑIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, JOHN DOE, and THOMAS
BAKER,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

PLAINTIFFS' REVISED PROPOSED VERDICT FORM

FIRST CLAIM: 42 U.S.C. § 1985(3)

1. Did Plaintiffs prove by a preponderance of the evidence their claim that one or more Defendants engaged in a conspiracy to commit racially motivated violence in violation of 42 U.S.C. § 1985(3)?

 YES NO

If you answered “NO,” to Question 1, please skip to Question 11. If you answered, “YES,” proceed to Questions 2-5.

- ~~1.2.~~ As instructed, you must take as true that Defendants Elliott Kline and Robert “Azzmador” Ray entered a conspiracy to engage in racially motivated violence, and that racially motivated violence occurred as a result of that conspiracy. For Defendants other than Elliott Kline and Robert “Azzmador” Ray, If you answered “YES,” to Question 1, please indicate (by marking each appropriate line with a check mark) which of the following you find, ⁺by a preponderance of the evidence, also entered into an agreement with one or more co-conspirators to engage in racially motivated violence., any and all Defendants against whom you find that Plaintiffs proved their 42 U.S.C. § 1985(3) claim:

 ALL DEFENDANTS (If you check here, proceed to Question ~~2.3~~)

If not all Defendants, specify which ones:

 Jason Kessler ~~Michael Hill~~
 Richard Spencer ~~Michael Tubbs~~
 Christopher Cantwell ~~League of the South~~
 James Alex Fields, Jr.
 Robert “Azzmador” Ray
 Nathan Damigo
 Elliott Kline
 Matthew Heimbach
 Matthew Parrott
 Michael Hill
 Michael Tubbs
 Jeff Schoep
 League of the South
 Vanguard America

⁺ Plaintiffs’ proposed verdict sheet omits those Defendants against whom an entry of default has been entered by the clerk, or against whom the Honorable Judge Hoppe has recommended an entry of default (the “Defaulted Defendants”).—ECF No. 268 (Andre Anglin, Moonbase Holdings, LLC); ECF No. 269 (East Coast Knights of the Ku Klux Klan); ECF No. 270 (Fraternal Order of the Alt Knights); ECF No. 271 (Augustus Sol Invictus); ECF No. 280 (Loyal White Knights of The Ku Klux Klan); and ECF No. 967 (Nationalist Front). Plaintiffs intend to move the Court for an entry of default judgment against the Defaulted Defendants under Federal Rule of Civil Procedure 55(b). If the Court determines that the jury should assess the amount of any damages against the Defaulted Defendants, Fed. R. Civ. P. 55(b)(2); Plaintiffs will submit an amended proposed verdict sheet at the Court’s request.

~~_____ Jeff Schoep _____~~ Nationalist Socialist Movement
~~_____ Nathan Damigo _____~~ Identity Evropa
~~_____ Mathew Heimbach _____~~ Traditionalist Worker Party
~~_____ Mathew Parrott _____~~

~~_____~~
~~2. For the conspiracy to commit racially motivated violence referenced in Question 1, did Plaintiffs prove by a preponderance of the evidence that they sustained injuries as a result of that conspiracy?~~

~~_____ YES _____ NO~~

~~Please proceed to Question 3.~~

3. For each Plaintiff who you found for on Claim 1, please state the total compensatory damages that will fully and fairly compensate that Plaintiff for the injuries sustained as a result of the conspiracy. All Plaintiffs except Chelsea Alvarado have brought this claim against all Defendants. Plaintiff Alvarado has brought this same claim against all Defendants except James Alex Fields, Jr.; her damages should be assessed accordingly.

Natalie Romero: \$ _____
April Muñiz: \$ _____
Thomas Baker: \$ _____
Elizabeth Sines: \$ _____
Marissa Blair: \$ _____
Marcus Martin: \$ _____
Chelsea Alvarado: \$ _____
Seth Wispelwey: \$ _____
Devin Willis: \$ _____

4. If you found for Plaintiffs as to Claim 1, do you find that punitive damages should be awarded against at least one Defendant?

_____ YES _____ NO

5. If you answered “YES,” to Question 4, on the following lines, please state the total punitive damages, if any, you are assessing against any such Defendant:

Jason Kessler: \$ _____

Richard Spencer:	\$ _____
Christopher Cantwell:	\$ _____
James Alex Fields, Jr.:	\$ _____
Robert “Azzmador” Ray:	\$ _____
Nathan Damigo:	\$ _____
Elliott Kline:	\$ _____
Mathew <u>Matthew</u> Heimbach:	\$ _____
Matthew Parrott:	\$ _____
Michael Hill:	\$ _____
Michael Tubbs:	\$ _____
Jeff Schoep:	\$ _____
Vanguard America:	\$ _____
League of the South:	\$ _____
Identity Evropa:	\$ _____
Traditionalist Worker Party:	\$ _____
Nationalist Socialist Movement:	\$ _____

Please proceed to Question 6 on the next page.

SECOND CLAIM: 42 U.S.C. § 1986

6. Did Plaintiffs prove by a preponderance of the evidence their claim that one or more Defendants had knowledge of the conspiracy found in Claim 1 and failed to prevent that conspiracy from taking place in violation of 42 U.S.C. § 1986?

_____ YES _____ NO

If you answered “NO,” to Question 6, please skip to Question 11. If you answered, “YES,” proceed to Questions ~~7-8~~7-10.

7. If you answered “**YES**,” to Question 6, please indicate (by marking each appropriate line with a check mark), any and all Defendants against whom you find that Plaintiffs proved their 42 U.S.C. § 1986 claim:

_____ ALL DEFENDANTS (If you check here, proceed to Question 8-)

If not all Defendants, specify which ones:

_____ Jason Kessler _____ ~~Michael Hill~~
_____ Richard Spencer
_____ ~~Michael Tubbs~~ _____ Christopher Cantwell _____ ~~Jeff Schoep~~
_____ James Alex Fields, Jr. _____ ~~Vanguard America~~
_____ Robert “Azzmador” Ray
_____ ~~League of the South~~ _____ Nathan Damigo
_____ ~~Identity Evropa~~ Elliott Kline
_____ Matthew Heimbach
_____ Matthew Parrott
_____ ~~Elliott Kline~~ _____ Michael Hill
_____ ~~Traditionalist Worker Party~~ Michael Tubbs
_____ Jeff Schoep
_____ League of the South
_____ Vanguard America
_____ ~~Mathew Heimbach~~ _____ Nationalist Socialist Movement
_____ ~~Mathew Parrott~~ Identity Evropa
_____ Traditionalist Worker Party

8. For each Plaintiff who you found for as to Claim 2, please state the total compensatory damages that will fully and fairly compensate that Plaintiff for the injuries sustained as a result of the Defendants’ failure to prevent the Section 1985(3) conspiracy. All Plaintiffs except Chelsea Alvarado have brought this claim against all Defendants. Plaintiff Alvarado has brought this same claim against all Defendants except James Alex Fields, Jr.; her damages should be assessed accordingly.

Natalie Romero: \$ _____
April Muñiz: \$ _____

Thomas Baker: \$ _____
Elizabeth Sines: \$ _____
Marissa Blair: \$ _____
Marcus Martin: \$ _____
Chelsea Alvarado: \$ _____
Seth Wispelwey: \$ _____
Devin Willis: \$ _____

9. If you found for Plaintiffs on Claim 2, do you find that punitive damages should be awarded against at least one Defendant?

_____ YES _____ NO

10. If you answered YES to Question 9, on the following lines, please state the total punitive damages, if any, you are assessing against any such Defendant:

Jason Kessler: \$ _____
Richard Spencer: \$ _____
Christopher Cantwell: \$ _____
James Alex Fields, Jr.: \$ _____
Robert "Azzmador" Ray: \$ _____
Nathan Damigo: \$ _____
Elliott Kline: \$ _____
~~Mathew~~ Matthew Heimbach: \$ _____
Matthew Parrott: \$ _____
Michael Hill: \$ _____
Michael Tubbs: \$ _____
Jeff Schoep: \$ _____
Vanguard America: \$ _____
League of the South: \$ _____
Identity Evropa: \$ _____
Traditionalist Worker Party: \$ _____
Nationalist Socialist Movement: \$ _____

Please proceed to Question 11 on the next page.

THIRD CLAIM: CIVIL CONSPIRACY

11. Did Plaintiffs prove by a preponderance of the evidence each element of their Virginia state law civil conspiracy claim?

_____ YES _____ NO

If you answered "NO," to Question 11, please skip to Question 16. If you answered, "YES," proceed to Questions 12-15.

12. If you answered "**YES**," to Question 11, please indicate (by marking each appropriate line with a check mark) which of the following Defendants you find, by a preponderance of the evidence, were members of that conspiracy.

_____ ALL DEFENDANTS (If you check here, proceed to ~~next~~
~~question~~Question 13.)

If not all Defendants, specify which ones:

_____ Jason Kessler _____ ~~Michael Hill~~
_____ Richard Spencer
_____ ~~Michael Tubbs~~ _____ Christopher Cantwell
_____ ~~James Alex Fields, Jr.~~
_____ ~~Robert "Azzmador" Ray~~
_____ ~~Nathan Damigo~~
_____ ~~Elliott Kline~~
_____ ~~Matthew Heimbach~~
_____ ~~Matthew Parrott~~
_____ ~~Michael Hill~~
_____ ~~Michael Tubbs~~
_____ Jeff Schoep
_____ ~~James Alex Fields, Jr.~~ _____ ~~Vanguard America~~
_____ ~~Robert "Azzmador" Ray~~ _____ ~~League of the South~~
_____ ~~Nathan Damigo~~ _____ ~~Vanguard America~~
_____ ~~Nationalist Socialist Movement~~
_____ Identity Evropa
_____ ~~Elliott Kline~~ _____ Traditionalist Worker Party

_____ ~~Mathew Heimbach~~ _____ ~~Nationalist Socialist Movement~~
_____ ~~Mathew Parrott~~

13. For each Plaintiff who you found for as to Claim 3, please state the total compensatory damages that will fully and fairly compensate that Plaintiff for the injuries sustained as a result of the civil conspiracy. All Plaintiffs except Chelsea Alvarado have brought this claim against all Defendants. Plaintiff Alvarado has brought this same claim against all Defendants except James Alex Fields, Jr.; her damages should be assessed accordingly.

Natalie Romero:	\$ _____
April Muñiz:	\$ _____
Thomas Baker:	\$ _____
Elizabeth Sines:	\$ _____
Marissa Blair:	\$ _____
Marcus Martin:	\$ _____
Chelsea Alvarado:	\$ _____
Seth Wispelwey:	\$ _____
Devin Willis:	\$ _____

14. If you found for at least one Plaintiff as to Claim 3, do you find that punitive damages should be ~~assessed~~ awarded against at least one Defendant?

_____ YES _____ NO

15. If you answered ~~no~~ “YES,” to Question 14, on the following lines, please state the total punitive damages you are assessing against any such Defendant:

Jason Kessler:	\$ _____
Richard Spencer:	\$ _____
Christopher Cantwell:	\$ _____
James Alex Fields, Jr:	\$ _____
Robert “Azzmador” Ray:	\$ _____
Nathan Damigo:	\$ _____
Elliott Kline:	\$ _____
Mathew <u>Matthew</u> Heimbach:	\$ _____
Matthew Parrott:	\$ _____
Michael Hill:	\$ _____
Michael Tubbs:	\$ _____
Jeff Schoep:	\$ _____
Vanguard America:	\$ _____
League of the South:	\$ _____
Identity Evropa:	\$ _____
Traditionalist Worker Party:	\$ _____
Nationalist Socialist Movement:	\$ _____

Please proceed to Question 16 on the next page.

FOURTH CLAIM: VIRGINIA CODE § 8.01-42.1

16. Plaintiffs Natalie Romero, April Muñoz, Seth Wispelwey, Elizabeth Sines, Marissa Blair, Marcus Martin, Chelsea Alvarado, and Devin Willis, ~~and Seth Wispelwey~~ bring a claim under Virginia Code § 8.01-42.1, against Defendants Jason Kessler, Richard Spencer, Elliot Kline, James Alex Fields, Jr., Robert “Azzmador” Ray, and Christopher Cantwell. ~~Did Plaintiffs prove by a preponderance of the evidence each element of their claim that one or more of those Defendants subjected them to racial, religious or ethnic harassment, violence or vandalism in violation of Virginia Code § 8.01-42.1?~~ Chelsea Alvarado brings the same claim against Defendants Jason Kessler, Richard Spencer, Elliott Kline, Robert “Azzmador” Ray, and Christopher Cantwell.

Did those Plaintiffs prove by a preponderance of the evidence each element of their claim that one or more of those Defendants subjected them to racial, religious or ethnic harassment, violence or vandalism in violation of Virginia Code § 8.01-42.1?

_____ YES _____ NO

If you answered “NO,” to Question 16, please skip to Question 2021. If you answered, “YES,” proceed to Questions ~~17-19~~17-20.

17. If you answered “YES,” to Question 16, please indicate (~~by making by marking~~ each appropriate line with a check mark) any and all Defendants against whom you find that Plaintiffs proved their Virginia Code § 8.01-42.1 claim.

~~_____ ALL DEFENDANTS (If you check here, proceed to next question.)~~

~~_____ If not all Defendants, specify which ones:~~

_____ Jason Kessler
_____ Richard Spencer
_____ ~~Elliot~~ Elliott Kline
_____ James Alex Fields, Jr. _____
_____ Robert “Azzmador” Ray
_____ Christopher Cantwell

18. For each Plaintiff who you found for as to Claim 4, please state the total compensatory damages that will fully and fairly compensate that Plaintiff for the resulting injuries. Plaintiff Alvarado did not bring this same claim against Defendant James Alex Fields, Jr.; her damages should be assessed accordingly.

Natalie Romero: \$ _____
April Muñiz: \$ _____
Seth Wispelwey: \$ _____
Elizabeth Sines: \$ _____
Marissa Blair: \$ _____
Marcus Martin: \$ _____
Devin Willis: \$ _____
Chelsea Alvarado: \$ _____

Devin Willis: \$ _____

~~19. For each Defendants against whom you found that Plaintiffs proved their Virginia Code § 8.01-42.1 claim, you must decide whether to assess punitive damages. Please indicate on the lines below which Defendants, if any, you assess punitive damages against and state the amount.~~

~~YES/NO~~ _____ ~~Punitive Damages~~

19. If you found for at least one Plaintiff as to Claim 4, do you find that punitive damages should be awarded against at least one Defendant?

 YES NO

20. If you answered “YES,” to Question 19, on the following lines, please state the total punitive damages you are assessing against any such Defendant:

 ~~Jason Kessler~~ Jason Kessler: _____
\$ _____
 Richard Spencer: _____ \$ _____
 ~~Elliot Elliott~~ Kline: _____ \$ _____

 James Alex Fields, Jr: _____ \$ _____

 Robert “Azzmador” Ray: _____ \$ _____
 Christopher Cantwell: _____
\$ _____

Please proceed to Question 21 on the next page.

FIFTH CLAIM: ASSAULT OR BATTERY

~~20-21.~~ 21. Plaintiffs Natalie Romero, April Muñiz, Thomas Baker, Elizabeth Sines, Marissa Blair, and Marcus Martin, ~~and Chelsea Alvarado,~~ bring a claim for assault or battery against Defendant James Alex Fields, Jr. Did those Plaintiffs prove by a preponderance of the evidence each element of their claim for assault or battery?

_____ YES _____ NO

If you answered “NO,” to Question 21, please skip to Question 25. If you answered, “YES,” proceed to Questions 22-24.

~~21-22.~~ 22. For any Plaintiff who you found for as to Claim 5, please state the total compensatory damages that will fully and fairly compensate that Plaintiff for the resulting injuries.

Natalie Romero: \$ _____
April Muñiz: \$ _____
Thomas Baker: \$ _____
Elizabeth Sines: \$ _____
Marissa Blair: \$ _____
Marcus Martin: \$ _____

~~Chelsea Alvarado:~~ \$ _____

~~22-23.~~ 23. If you found for at least one Plaintiff as to Claim 5, do you find that punitive damages should be awarded?

_____ YES _____ NO

~~23-24.~~ 24. If you answered ~~“YES,”~~ **“YES,”** to Question ~~2223~~, on the following lines, please state the total punitive damages you are assessing against Defendant James Alex Fields Jr. for these claims:

\$ _____

Please proceed to Question 25 on the next page.

SIXTH CLAIM: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

~~24-25.~~ Plaintiffs Natalie Romero, April Muñiz, Thomas Baker, Elizabeth Sines, Marissa Blair, and Marcus Martin, ~~and Chelsea Alvarado,~~ bring a claim for intentional infliction of emotional distress against Defendant James Alex Fields-, Jr. Did Plaintiffs prove by clear and convincing evidence each element of their claim for intentional infliction of emotional distress?

_____ YES _____ NO

If you answered “NO,” to Question ~~24~~25, please proceed to the END. If you answered “YES,” to Question 25, please proceed to Questions 26-28.

~~25-26.~~ For each Plaintiff who you found for as to Claim 6, please state the total compensatory damages that will fully and fairly compensate that Plaintiff for the resulting injuries.

Natalie Romero:	\$ _____
April Muñiz:	\$ _____
Thomas Baker:	\$ _____
Elizabeth Sines:	\$ _____
Marissa Blair:	\$ _____
Marcus Martin:	\$ _____

~~Chelsea Alvarado:~~ \$ _____

~~26-27.~~ If you found for at least one Plaintiff as to Claim 6, do you find that punitive damages should be awarded?

_____ YES _____ NO

~~27-28.~~ If you answered, “YES,” to Question ~~26~~27, on the following lines, please state the total punitive damages you are assessing against Defendant James Alex Fields-, Jr. for these claims:

\$ _____

SEVENTH CLAIM: NEGLIGENCE PER SE

~~28. Plaintiffs Natalie Romero, April Muñiz, Thomas Baker, Elizabeth Sines, Marissa Blair, Marcus Martin, and Chelsea Alvarado, bring a claim of negligence per se~~

~~against Defendant James Alex Fields Jr. Did Plaintiffs prove by a preponderance of the evidence each element of their negligence per se claim?~~

~~_____ YES _____ NO~~

~~If you answered “NO,” to Question 28, please proceed to the end.~~

~~_____~~
29. For each Plaintiff who you found for as to Claim 7, please state the total compensatory damages that will fully and fairly compensate that Plaintiff for the resulting injuries.

Natalie Romero: \$ _____
April Muñoz: \$ _____
Thomas Baker: \$ _____
Elizabeth Sines: \$ _____
Marissa Blair: \$ _____
Marcus Martin: \$ _____
Chelsea Alvarado: \$ _____

END – STOP HERE

Date: ~~October 12~~November 17, 2021

Respectfully submitted,

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Raymond P. Tolentino (*pro hac vice*)

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on ~~October 12~~November 17, 2021, I served the following via electronic mail:

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isuecrooks@comcast.net

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*Counsel for Defendants Jeff Schoep,
National Socialist Movement, Nationalist
Front, Matthew Parrott, Traditionalist
Worker Party and Matthew Heimbach*

I hereby certify that on ~~October 12~~November 17, 2021, I also served the following via mail and ~~electronic mail~~by hand:

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richardbspencer@icloud.com
richardbspencer@gmail.com

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~~Chickasha, OK 73018~~

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~~USP Marion, 4500 Prison Rd.~~
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~~Marion, IL 62959~~
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